

### REMARKS

This Application has been carefully reviewed in light of the Final Office Action mailed October 30, 2008. At the time of the Final Office Action, Claims 6-20 were pending in this Application. Claims 6-20 were rejected. Claims 1-5 were previously canceled. Applicant respectfully requests reconsideration and favorable action in this case.

#### **Rejections under 35 U.S.C. § 112**

Claims 6-20 were rejected by the Examiner under 35 U.S.C. §112, second paragraph, as being indefinite and failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. The Examiner specifically stated that the second network connects control function units for real-time communication between all control function units but the network shown in Fig. 1 does, for example, not show connection between LF1 and LF4. Applicant respectfully disagrees with this interpretation.

The specification, specifically states:

*Cross-communication Q1 to Q3 is a data link with real-time capability and thus ensures that essential information is available at all movement control points simultaneously. This includes, for example, synchronization and error signals, and signals which necessitate immediate action.*

Specification, page 6, paragraph 16. Moreover, the specification states:

*The cross-communication Q1 to Q3 in real-time means that all the control functional units LF1 to LF4 have this information at the same time. Once a fault has been identified and a counter measure has been initiated, this leads to an immediate reaction at the same time in the drive groups. This advantageously allows an improved printed product quality to be achieved.*

*Since all the control functional units LF1 to LF4 are connected by means of real-time cross-communication Q1 to Q3, this ensures that all the*

*information relating to movement control is available all the time throughout the system.*

Specification, page 7, paragraph 18-19. Hence, the specification, specifically states that all control functional units LF1 to LF4 are connected by means of real-time cross-communication Q1 to Q3 which thus establishes a network between the control functional units LF1 to LF4. A person skilled in the art of networking will, thus, readily understand that the exemplary Figure 1 merely shows an example of cross communication links or a network in which the control functional units LF1 and LF3 either must provide for the connection of Q3 and Q1 in LF1 and the connection Q1 and Q2 in LF3 to ensure a direct coupling or for data forwarding within LF1 and LF3 that is fast enough to qualify for real-time communication. The specification merely states that the cross communication must ensure that essential information is available at all movement control points. Specification, page 6, paragraph 16. Whatever qualifies for real-time depends on the respective process. Thus, even if information on Q3 is passed through LF1 to be forwarded on Q1, this still could fulfill real-time specification if the pass through of data is fast enough, and thus does not contradict the specification. Most importantly, Figure 1 merely shows one example of a plurality of cross communication links. Similar as explained with the network for drive regulators A1-A35 (see paragraph [0013] penultimate sentence), the cross communication links could be arranged differently as long as it provides for real-time communication between the control functional units.

To this end, the specification states in the Summary section:

*This object is achieved through the discovery that information relating to movement control can be interchanged by means of real-time, cross-communication between the control functional units. All movement control systems which control complex processes can thus react simultaneously to relevant events in a matched manner.*

*In a preferred embodiment of the present invention, real-time cross-communication is carried out using Ethernet links. Using Ethernet makes it is possible to use known bus protocols. Particularly when using fast*

*Ethernet, the very short bus cycles used can result in a wider dynamic range due to the movement control system controlling the complex processes.*

Specification, page 3, paragraph 5-6. The specification, thus, teaches to use Ethernet links to provide cross-communication between the control functional units. A person skilled in the art would clearly understand that a plurality of cross-communication links, such as Ethernet links, between the control functional units establishes a network in particular because the specification describes that all movement control systems which control complex processes can react simultaneously by means of these communication links.

In summary, Applicant believes that all independent claims are particularly pointing out and distinctly claim the present invention. Applicants respectfully submit that the dependent Claims are allowable at least to the extent of the independent Claim to which they refer, respectively. Thus, Applicants respectfully request reconsideration and allowance of the dependent Claims. Applicants reserve the right to make further arguments regarding the Examiner's rejections under 35 U.S.C. §103(a), if necessary, and do not concede that the Examiner's proposed combinations are proper.


**CONCLUSION**

Applicant has now made an earnest effort to place this case in condition for allowance in light of the remarks set forth above. Applicant respectfully requests reconsideration of all pending Claims.

Applicant believes there are no fees due at this time, however, the Commissioner is hereby authorized to charge any fees necessary or credit any overpayment to Deposit Account No. 50-2148 of Baker Botts L.L.P.

If there are any matters concerning this Application that may be cleared up in a telephone conversation, please contact Applicant's attorney at 512.322.2545.

Respectfully submitted,  
BAKER BOTTS L.L.P.  
Attorney for Applicant

A handwritten signature in black ink, appearing to read 'A. Grubert', with a stylized flourish at the end.

Andreas Grubert  
Reg. No. 59,143

Date: January 28, 2009

**SEND CORRESPONDENCE TO:**

Baker Botts L.L.P.

CUSTOMER ACCOUNT NO. **31625**

512.322.2545

512.322.8383 (fax)